

## REMARKS

By this amendment, Claims 1, 4–6, 9–11, 14–16, 19, and 20 are amended. No claims are added or canceled. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed November 28, 2007, is addressed hereinafter.

### I. ISSUES RELATING TO CLAIM AMENDMENTS

Amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art. Support for the amendments made to the claims can be found in the at least the following paragraphs of the Specification: Paragraph [0017]: (“The approach includes mechanisms for automatically generating XML requests that conform to a hierarchical data model from requests that conform to a table-based data model.”), Paragraph [0041], Table IV.

### II. ISSUES RELATING TO CITED PRIOR ART: CLAIMS 1–20—SHAFER

Claims 1–20 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,072,946, issued to Shafer (“*Shafer*”). Based on the following arguments, the rejections are respectfully traversed.

Independent Claim 1 recites:

A computer-implemented method for processing XML requests on a router, the method comprising the **machine-executed steps** of:

receiving, at a client from a client application, **a non-XML request that conforms to a table-based data model** to

perform an operation on management data maintained by the router;

**generating an XML request from the non-XML request;**

....

(Emphases added.) “A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.”

*Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Because *Shafer* fails to provide at least the bold-faced features of Claim 1 shown above, it is respectfully submitted that Claim 1 is patentable over *Shafer*.

Nothing in *Shafer* teaches or suggests “**receiving ... a non-XML request that conforms to a table-based data model,**” and “**generating an XML request from the non-XML request,**” as featured in Claim 1. In contrast to Claim 1, *Shafer* does not teach or suggest any details regarding **how the XML request that is transmitted to the XML API at the router is generated.** Instead, in *Shafer*, clients, which can be human users or automated script applications, log into the router’s command line interface (CLI), then transmit an “xml-mode” command to the CLI, causing the CLI to be dynamically replaced by the XML API. (*Shafer*, Col. 7, lines 14–25; Figure 3.) *Shafer* describes that after activating the XML API by executing the “xml-mode” command, the human users or script applications communicate with the router via XML requests using the XML API. (Figure 3.) However, *Shafer* does not teach or suggest **how** the human users or script applications encode the XML requests. In particular, *Shafer* does not teach or suggest the machine-executed step of “generating an XML request from the non-XML request” that “conforms to a table-based data model,” as featured in Claim 1. Furthermore, *Shafer* does not teach or suggest any client “receiving ... a non-XML request that conforms to a

table-based data model.” Because *Shafer* fails to disclose one or more express elements of Claim 1, it is respectfully submitted that Claim 1 is patentable over *Shafer*.

Independent Claims 4–6, 9–11, 14–16, 19, and 20 include features similar to Independent Claim 1, and in particular, each of the other independent claims teach the express features discussed above that are not taught or suggested by *Shafer*, except in the context of computer-readable media, in means-plus-function form, or as an apparatus claim. It is therefore respectfully submitted that Claims 4–6, 9–11, 14–16, 19, and 20 are patentable over *Shafer* for at least the reasons given above with respect to Claim 1.

Each of the dependent claims remaining to be discussed depends (directly or indirectly) on Independent Claim 1, and other independent claims. Each of the dependent claims is therefore allowable for at least the reasons given above with respect to Claim 1, and other independent claims. In addition, each of the dependent claims introduces one or more additional features that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of the dependent claims is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

## **CONCLUSION**

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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